

1 LUIS A. AYON, ESQ.  
Nevada Bar No. 9752  
2 **AYON LAW, PLLC**  
9205 West Russell Road  
3 Building 3, Suite 240  
Las Vegas, Nevada 89148  
4 Telephone: (702) 600-3200  
5 Facsimile: (702) 447-7936  
6 **E-Mail: laa@ayonlaw.com**

7 *Attorneys for Defendants,*  
8 *Flamingo 316, LLC, Dadon Condos, LLC, Tom Dadon, as Trustee*  
9 *of T&D Nevada Trust, Daniela Dadon, as Trustee of T&D Nevada Trust,*  
10 *Meridian Resorts LLC and 220 East Flamingo Unit 316 Series*

11 **UNITED STATES DISTRICT COURT**

12 **FOR THE DISTRICT OF NEVADA**

13 HSBC BANK USA, N.A. AS TRUSTEE  
FOR PHH 2007-3,

14 Plaintiff,

15 vs.

16 FLAMINGO 316, LLC, a series of Nevada  
17 Rental Holdings, LLC; MERIDIAN  
18 PRIVATE RESIDENCES HOMEOWNERS  
19 ASSOCIATION, a Nevada non-profit  
20 corporation; DADON CONDOS, LLC;  
21 TOM DADON and DANIELA DADON,  
Trustees of the T&D BEVADA TRUST;  
22 MERIDIAN RESORTS LLC, 220 E.  
23 FLAMINGO UNIT 316 SERIES;  
RICHARD COHEN and individual; IRIS  
COHEN, an individual,

24 Defendants.

Case No.: 2:17-cv-02400-JAD-NJK

25 **STIPULATION TO EXTEND TIME TO**  
26 **RESPOND TO PLAINTIFF HSBC BANK**  
27 **USA, N.A.'S COMPLAINT**

28 **(First Request)**

IT IS HEREBY STIPULATED by and between Plaintiff HSBC BANK USA, N.A. AS  
TRUSTEE FOR PHH 2007-3 (hereinafter "HSBC") and Defendants, FLAMINGO 316, LLC,  
DADON CONDOS, LLC, TOM DADON, AS TRUSTEE OF T&D NEVADA TRUST, DANIELA  
DADON, AS TRUSTEE OF T&D NEVADA TRUST, MERIDIAN RESORTS LLC AND 220  
EAST FLAMINGO UNIT 316 SERIES (hereinafter Flamingo 316, LLC, Dadon Condos, LLC, Tom

1 Dadon, as Trustee of T&D Nevada Trust, Daniela Dadon, as Trustee of T&D Nevada Trust, Meridian  
2 Resorts LLC and 220 East Flamingo Unit 316 Series shall be referred to collectively as the "Parties")  
3 through their respective counsel of record as follows:

4 WHEREAS, HSBC filed its Complaint on September 13, 2017.

5 WHEREAS, Parties retained Luis A. Ayon, Esq. of Ayon Law, PLLC as counsel of record on  
6 October 5, 2017.

7 WHEREAS, counsel for HSBC was notified of the Parties representation via email on October  
8 5, 2017 and counsel for HSBC informed Luis A. Ayon, Esq. that the Parties were individually served  
9 with the Complaint on September 18<sup>th</sup> & 19<sup>th</sup>, respectively.

10 WHEREAS, the Parties' responsive pleading is due to HSBC's Complaint on Monday,  
11 October 9, 2017 and HSBC and the Parties are discussing potential settlement of this matter.  
12 Therefore, the additional time will allow counsel to have further discussions toward that resolution.

13 WHEREAS, The Parties stipulate as follows:

14 IT IS HEREBY AGREED AND STIPULATED between HSBC and the Parties, by and  
15 through their undersigned attorneys, that the Parties shall have up to and including October 23, 2017  
16 to file its responsive pleading to Plaintiff's Complaint.

17 This is the Parties first request for an extension of time to file their responsive pleading to  
18 Plaintiff's Complaint and is not intended to cause any delay or prejudice to any Party.

19 Approved as to Form and Content:

20 DATED this 10th day of October, 2017.

21 DATED this 10<sup>th</sup> day of October, 2017.

22 **AYON LAW, PLLC**

**BALLARD SPAHR LLP**

23 /s/ Luis A. Ayon  
24 LUIS A. AYON, ESQ.  
25 Nevada Bar No. 9752  
26 9205 W. Russell Road  
27 Building 3, Suite 240  
28 Las Vegas, Nevada 89148

/s/Holly Ann Priest  
HOLLY ANN PRIEST, ESQ.  
Nevada Bar No. 13226  
100 N. City Parkway, Suite 1750  
Las Vegas, Nevada 89106

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ORDER**

Pursuant to the above Stipulation of HSBC and the Parties, it is ORDERED that:

1. The Parties shall have up to and including October 23, 2017 to file its responsive pleading to Plaintiff HSBC's Complaint.

DATED October 11, 2017.

  
\_\_\_\_\_  
United States Magistrate Judge